

September 17, 1998

Mr. Jorge DeGuzman
Air Pollution Control Engineer
Sacramento Metropolitan Air Quality Management District
8411 Jackson Road
Sacramento, CA 95826

Re: Proposed Title V Operating Permit for Proctor & Gamble Manufacturing
Company

Dear Mr. DeGuzman:

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to review and comment on the proposed Title V Operating Permit for Proctor & Gamble (No. 96-02). In accordance with 40 CFR §70.8(c), and the Sacramento Metropolitan Air Quality Management District (District) Rule 207, the EPA has reviewed the proposed permit during our 45-day review period.

EPA would like to commend the District on their continued efforts to propose permits which contain many examples of enforceable conditions with adequate monitoring, record keeping and reporting requirements. However, as my staff discussed with you on September 2, 1998 and September 15, 1998, there are several issues that require changes to the proposed permit. During those telephone conversations, you agreed to make these changes before issuing the final permit. We have enclosed our comments for your review.

We thank you for your continued efforts to work in a cooperative and constructive manner to resolve issues. If you have any questions concerning our comments, please do not hesitate to contact John Walser of my staff at (415) 744-1257. I thank you again for your time and effort to develop excellent permits.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

enclosure

cc: Ray Menebroker, CARB
David Mills, Proctor & Gamble

ENCLOSURE

EPA Comments on the Proposed Title V Operating Permit for Proctor & Gamble (Permit No. 96-02)

1. *Baghouse* -- In the Alternative Operating Scenario #2 section of the permit on Page 46, which lists the equipment operation requirements for the physically refined oil process baghouse, EPA is concerned that no monitoring is listed to assure compliance with the particulate emissions limits of 0.1 gr/dscf and the Ringelmann 1 limit in the SIP. Condition 2 in the permit states that the baghouse will be equipped with a pressure differential gauge to indicate pressure drops across the bags, and the baghouse will be operated within the recommended range. However, no specific range is identified in the permit. EPA recommends listing the range in the permit.

Condition 4 in this section of the permit states that the cartridges cleaning frequency and duration shall be adjusted to optimize the control efficiency. However, no specific frequency or duration is identified. As a result, this condition is not enforceable as written. EPA recommends adding specific cleaning frequency and duration to this condition. Also, the permit conditions as written may not be adequate to indicate particulate breakthrough at a level which could cause a violation of the emission limit. Therefore, EPA recommends that the proposed permit be modified to include record keeping of the pressure differential on at least a weekly basis. If record keeping indicates a pressure drop out of the manufacturers range, monitoring, such as visual observation should be considered. In our September 15, 1998 telephone conversation, the District has agreed to make these changes to the proposed permit.

2. *MACT Standards* -- As agreed to by District staff, (via the September 10, 1998 facsimile to EPA), the District will add a discussion to the permit evaluation regarding NESHAP (40 CFR Part 63) requirements for this source. According to the District, Proctor & Gamble is not subject to the following NESHAP requirements:

Organic HAP from the Synthetic Organic Chemical Manufacturing Industry (40 CFR Part 63, Subpart F), NESHAP for Organic HAP from SOCMCI for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (40 CFR Part 63, Subpart G), NESHAP for Organic HAP for Equipment Leaks (40 CFR Part 63, Subpart H), NESHAP for Oil-Water Separators and Organic-Water Separators (40 CFR part 63, Subpart VV), NESHAP for Group 1 Polymers and Resins (40 CFR Part 63, Subpart U), NESHAP for Group IV Polymers and Resins (40 CFR Part 63, Subpart JJJ), and NESHAP for Epoxy Resins Production and Non-Nylon Polyamides Production (40 CFR part 63, Subpart W).

3. *Alternative Compliance Methods* -- In the Equipment-Specific Requirements Section of the permit for the methanol absorber, condition 10 states: "as an alternative to the annual compliance testing outlined in condition 9, Proctor & Gamble may propose an alternative compliance method. Proctor & Gamble shall provide written documentation, to the satisfaction of the Air Pollution Officer, that compliance with the applicable

emission limit can be demonstrated through the use of this alternative compliance method. Proctor & Gamble must obtain written approval for the Air Pollution Control Officer before this alternative compliance method can be used.” EPA is concerned that an alternative compliance method may not be as stringent as the annual source testing presently required, and may include significant changes to the monitoring proposed in condition 2 (EPA Methods 1 through 4, 18, 25, and 25A). This language as written is not consistent with the requirements of 40 CFR 70.7 (e) which states that any significant changes to existing monitoring (which would include alternative compliance testing methods), reporting, or record keeping requirements must be processed as a significant revision.

In a our conversation with Mr. Jorge DeGuzman on September 15, 1998, the District concurs with our concerns and has agreed to remove this condition entirely from the permit. Alternatively, if this condition is not removed from the permit, the District has agreed to add language to the permit condition stating that any significant changes to existing monitoring (which would include alternative compliance testing methods), reporting, or record keeping requirements must be processed as a significant revision. The District in this case would also remove specific citations to either District or EPA approval of alternative compliance testing methods.

4. *Dowtherm Heater* -- In the Equipment-Specific Federally Enforceable Requirements section of the permit, condition 2 states that the dowtherm heater, when burning natural gas, shall not emit in excess of 30 ppmv of NO_x, averaged over 15 consecutive minutes, corrected to 3% O₂. Condition 3 states that the heater shall operate on PUC-regulated natural gas only and shall be limited to 220 million cubic feet per year. These conditions are inconsistent with each other. If the heater can operate on natural gas only, then the phrase “when burning natural gas” is not needed. However, EPA is concerned that the heater can in fact burn fuel other than natural gas. Permit to Construct #12183, condition 5, states that the dowtherm heater, when burning diesel No. 2 fuel, shall not emit NO_x in excess of 30 ppmv. Please clarify that the heater shall burn natural gas only and make that explicit in the permit. In our September 2, 1998 telephone conversation, District staff has agreed to limit the fuel to natural gas only. If the heater could burn diesel fuel, additional monitoring would be needed to ensure compliance with the applicable limits.

5. *Correction* -- on Page 15, under Local General Requirements, change the reference to “SFPP” in Condition 2. This language is from a previous proposed Title V permit for Santa Fe Pacific Pipeline (SFPP) Bulk Terminal. Please correct this condition and change “SFPP” to “Proctor & Gamble.”

6. *Architectural Coatings* -- Conditions 30, 31, and 32 cover VOC emissions from architectural coatings (District Rule 442). Conditions 28, 29 and 30 in the General Requirements Section of the permit state that any coating used must comply with District Rules 442 and 420. However, no reporting or record keeping is required by the rules, and there is no provision for it in the permit. EPA recognizes that the rule is primarily a manufacturing and sale restriction, but the source shares responsibility in ensuring that it purchases and uses products that comply with the rule. Therefore, the permit should contain a provision for recording architectural coatings purchased and applied. Although California has a state law which assures compliance with the rule, coatings may be purchased from other states. Thus, we suggest the following language, as agreed to by

District staff on September 15, 1998:

Proctor & Gamble shall keep a record of all architectural coatings purchased that are not clearly labelled as complying with the VOC content limits contained in Rule 442. Compliance in these cases can be determined by maintaining records of manufacturer's certifications or by Material Safety Data Sheets (MSDS) that demonstrate compliance with the VOC limits of Rule 442.